

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

CLEVELAND BROWNS FOOTBALL
COMPANY LLC,

Plaintiff,

v.

THE CITY OF CLEVELAND,

Defendant,

STATE OF OHIO,

Intervenor.

Case No: 1:24-cv-1857

Judge David A. Ruiz

**DEFENDANT CITY OF CLEVELAND’S MOTION TO EXTEND THE TIME TO
RESPOND TO THE AMENDED COMPLAINT AND MEMORANDUM IN SUPPORT**

Defendant City of Cleveland respectfully requests an additional 30 days to respond to Plaintiff’s Amended Complaint.

This case was filed on October 24. Approximately three weeks later, an amended complaint was filed (Doc. No. 12) and the Court ordered an answer to be filed by December 16 (Nov. 15, 2024 Order). On December 9, just three days ago, the City retained Jones Day to represent it in this action.

Jones Day sought Plaintiff’s consent for a 30-day extension (to January 15) to allow counsel sufficient time to respond to the allegations and legal issues raised by the Amended Complaint, taking into account the holidays. Plaintiff consented to just 7 days, necessitating this opposed motion.

The City does not seek additional time for purposes of delay, but, instead, to ensure that any briefing to the Court is well-researched and reasoned, a task worth additional time given the novel issues presented by the Amended Complaint. For these reasons, the City respectfully asks that its date to respond to the Amended Complaint be extended to January 15, 2025.

Dated: December 12, 2024

Respectfully submitted,

/s/ Justin E. Herdman

Justin E. Herdman (0080418)

Tracy K. Stratford (0069457)

James R. Saywell (0092174)

Samuel V. Lioi (0100464)

Gregory E. Hilbert (0101242)

JONES DAY

North Point

901 Lakeside Avenue

Cleveland, OH 44114-1190

Phone: (216) 586-7108

Fax: (216) 579-0212

Email: jherdman@jonesday.com

tkstratford@jonesday.com

jsaywell@jonesday.com

slioi@jonesday.com

ghilbert@jonesday.com

Mark D. Griffin (0064141)

Director of Law

City of Cleveland, Department of Law

601 Lakeside Avenue, Room 106

Cleveland, Ohio 44114-1077

Tel: (216) 664-2800

Email: MGriffin@clevelandohio.gov

*Attorneys for Defendant The City of
Cleveland*

CERTIFICATE OF SERVICE

This is to certify that the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which automatically serves e-mail notification of such filing to the attorneys of record, each of whom is a registered participant in the Court's electronic notice and filing system and each of whom may access this filing via the Court's CM/ECF system.

Dated: December 12, 2024

/s/ Justin E. Herdman
Justin E. Herdman

LOCAL RULE 7.1 CERTIFICATION

I certify that this case has not yet been assigned a track. This memorandum complies with the most stringent page limitations set forth in Local Rule 7.1.

/s/ Justin E. Herdman
Justin E. Herdman